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Frederick Moacdieh
Executive Director - Federal Regulatory Affairs

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Suite 400 West
Washington, DC 20005

(202) 515-2590
(202) 336-7922 (fax)

September 16, 2013

ACCEPTED/FILED

SEP 16 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

RE: Section 63.71 Application of Verizon New York Inc., Verizon New England Inc., Verizon New Jersey Inc., Verizon Pennsylvania LLC, Verizon Delaware LLC, Verizon Maryland LLC, Verizon Virginia LLC, Verizon Washington, DC Inc., Verizon North LLC, Verizon South Inc., GTE Southwest Incorporated (d/b/a Verizon Southwest), Verizon California Inc., Verizon Florida LLC

Dear Ms. Dortch:

Verizon hereby submits the enclosed Application under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to discontinue its Metallic Service, Program Audio Service, and Telegraph Grade Service throughout Verizon's service territories, not including the areas that are covered by the pending application to discontinue these same services in areas of Lower Manhattan and in portions of New Jersey where Superstorm Sandy destroyed copper facilities.

Verizon is filing an original and five copies of this letter (with attachment) with the Office of the Secretary.

If you have any questions regarding this matter, please contact me at 202-515-2590.

A handwritten signature in black ink, appearing to be "Paul".

Encl.

cc: Secretary of Defense, Attn: Special Assistant for Telecommunications
Public Utilities Commission for Each Impacted State
Governor of Each Impacted State

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

ACCEPTED/FILED

In the Matter of)
)
)
Section 63.71 Application of)
Verizon New York Inc., Verizon New)
England Inc., Verizon New Jersey Inc.,)
Verizon Pennsylvania LLC, Verizon)
Delaware LLC, Verizon Maryland LLC,)
Verizon Virginia LLC, Verizon)
Washington, DC Inc., Verizon North LLC,)
Verizon South Inc., Verizon California)
Inc., Verizon Florida LLC, and GTE)
Southwest Incorporated (d/b/a Verizon)
Southwest))
)
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934, As)
Amended To Discontinue the Provision of)
Service)

SEP 16 2013

Federal Communications Commission
Office of the Secretary

File No. _____

**SECTION 63.71 APPLICATION OF
VERIZON INCUMBENT LOCAL EXCHANGE COMPANIES**

The Verizon incumbent local exchange companies captioned above ("Verizon") submit this Application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to grandfather and eventually discontinue Metallic Service, Program Audio Service, and Telegraph Grade Service throughout Verizon's service territories, not including the areas that are covered by the pending application to discontinue these same services in areas of Lower Manhattan and in portions of New Jersey where Superstorm Sandy destroyed copper facilities.¹

¹ See, WC Docket No. 13-149, Section 63.71 Application of Verizon New York Inc. and Verizon New Jersey Inc. (Filed May 24, 2013).

Verizon plans to grandfather Metallic Service, Program Audio Service, and Telegraph Grade Service and to continue to serve existing customers in accordance with Verizon's tariffs and this application.

As Sections 63.71(a) and (b) of the Commission's rules require, Verizon provides the following information:

1. Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Pennsylvania LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon Washington, DC Inc.
1300 I Street, N.W.
Suite 400 West
Washington, DC 20005

Verizon Maryland LLC
1 East Pratt Street
Baltimore, MD 21202

Verizon Virginia LLC
22001 Loudoun County Parkway
Ashburn, VA 20147

Verizon Delaware LLC
901 Tatnall Street
Wilmington, DE 19801

Verizon New Jersey Inc.
540 Broad Street
Newark, NJ 07102

Verizon New York Inc.
140 West Street
New York, NY 10007

Verizon New England Inc.
125 High Street - Oliver Tower 7th Floor
Boston, MA 02110

Verizon North LLC
1717 Arch Street
Philadelphia, PA 19103

Verizon California Inc.
2535 W. Hillcrest Drive, CAM21LB
Newbury Park, CA 91320

Verizon Florida LLC
610 Zack Street
Tampa, FL 33602

Verizon South Inc.
22001 Loudoun County Parkway
Ashburn, VA 20147

GTE Southwest Incorporated (d/b/a Verizon Southwest)
600 Hidden Ridge
Irving, TX 75038

2. Date of Planned Service Discontinuance (47 C.F.R. §§ 63.71(a)(2), (b)(2)):

Subject to the Commission's authorization, on or after December 19, 2013, Verizon will stop accepting new orders for Metallic Service, Program Audio Service, and Telegraph Grade Service.² Existing customers may retain their grandfathered service in accordance with the terms of the applicable tariffs and this application. Verizon will not permit or accept orders for moves, adds, or changes to these existing services after they have been grandfathered. Customers that are subscribed to Metallic Service, Program Audio Service, or Telegraph Grade Service when the grandfathering takes effect will be able to keep their service until they choose to cancel it or until Verizon terminates the service. Verizon intends to terminate these services on or after June 30, 2014. Verizon will provide customers at least six months' written notice before terminating Metallic Service, Program Audio Service, or Telegraph Grade Service.

² Subject to the Commission's authorization, on December 4, 2013, Verizon intends to file tariff revisions on 15 days' notice to reflect the grandfathering and discontinuance.

3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3), (b)(2)):

Subject to the Commission's authorization, Verizon will discontinue these services where Verizon offers them in its service territory (not including the areas already covered by Verizon's application in WC Docket No. 13-149) as follows:

Metallic Service: Connecticut, New York, Massachusetts, Rhode Island, Delaware, Maryland, New Jersey, the District of Columbia, Pennsylvania, and Virginia. In Pennsylvania and Virginia, Verizon offers Metallic Service only in areas covered by its FCC Tariff No. 1.

Program Audio Service: Connecticut, New York, Massachusetts, Rhode Island, Delaware, Maryland, New Jersey, the District of Columbia, Pennsylvania, Virginia, California, Florida, Texas, and North Carolina.

Telegraph Grade Service: Connecticut, New York, Massachusetts, Rhode Island, Delaware, Maryland, New Jersey, the District of Columbia, Pennsylvania, and Virginia. In Pennsylvania and Virginia, Verizon offers Telegraph Grade Service only in areas covered by its FCC Tariff No. 1.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4), (b)(2)):

Metallic Service uses a metallic channel to transmit signals at low speeds up to 30 baud. Metallic channels are provided between customer-designated premises or between a customer location and a Verizon hub. Metallic Service is described in Verizon's FCC Tariff No. 1, Section 7.2.1, and Verizon's FCC Tariff No. 11, Section 7.2.1.

Program Audio Service provides an analog channel for the transmission of a complex signal voltage. Customers have the option to choose the bandwidth tier (50 to 15000 Hz; 200 to 3500 Hz; 100 to 5000 Hz; or 50 to 8000 Hz) to meet their needs. This service provides only one-way transmission. Program audio channels are provided between customer-

designated locations or between a customer location and a Verizon hub. It is described in Verizon's FCC Tariff No. 1, Section 7.2.4, Verizon's FCC Tariff No. 11, Section 7.2.4, Verizon's FCC Tariff No. 14, Section 5.2.3, and Verizon's FCC Tariff No. 16, Section 7.6.

Telegraph Grade Service uses a telegraph-grade channel to transmit binary signals at rates of up to 150 baud. Telegraph-grade channels are provided between customer-designated locations or between a customer location and a Verizon hub. Telegraph Grade Service is described in Verizon's FCC Tariff No. 1, Section 7.2.2, and Verizon's FCC Tariff No. 11, Section 7.2.2.

Verizon is discontinuing these services because they are obsolete and have been supplanted by newer technologies and services. Customers can choose from many alternative services, including Private IP service, Ethernet services, and private-line services that other providers currently offer, including carriers affiliated with Verizon. Consequently, the public convenience and necessity will not be impaired by this discontinuance.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

Verizon sent notices to affected customers that currently subscribe to Metallic Service, Program Audio Service, or Telegraph Grade Service by a combination of U.S. Mail and overnight courier on or before September 12, 2013. Copies of the notices are attached as Exhibit A.

Verizon is sending copies of this Application by first class U.S. Mail to the governor and public utilities commission for each affected state and U.S. territory as well as to the Special Assistant for Telecommunications to the Secretary of Defense, as required by Section 63.71(a) of the Commission's rules.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Verizon is considered dominant with respect to the services to be discontinued.

CONCLUSION

Verizon respectfully requests that the Commission approve this Application.

Respectfully submitted,

Michael E. Glover
Of Counsel

/s/ Curtis L. Groves
William H. Johnson
Curtis L. Groves
Verizon
1320 N. Courthouse Rd.
9th Floor
Arlington, VA 22201
(703) 351-3084 (Office)
(703)-351-3656 (Facsimile)

September 16, 2013

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2013, I served a copy of the foregoing Section 63.71 Application by U.S. Mail postage prepaid to the following parties on the attached service list.

/s/ Curtis L. Groves
Curtis L. Groves

SERVICE LIST

CALIFORNIA

Michael R. Peevey
President
Public Utilities Commission
505 Van Ness Avenue
Room 5218
San Francisco, CA 94102

The Honorable Edmund G. Brown Jr.
Office of the Governor
State Capitol Building
Sacramento, CA 95814

CONNECTICUT

Arthur H. House
Chairman
Public Utility Regulatory Authority
10 Franklin Square
New Britain, CT 06051

The Honorable Dannel P. Malloy
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

DELAWARE

Dallas Winslow
Chair
Public Service Commission
Cannon Building
Suite 100
861 Silver Lake Boulevard
Dover, DE 19904

The Honorable Jack Markell
Office of the Governor
Tatnall Building
William Penn Street, 2nd Floor
Dover, DE 19901

DISTRICT OF COLUMBIA

Betty Ann Kane
Chairman
District of Columbia Public Service
Commission
1333 H Street, NW
Suite 200, West Tower
Washington, DC 20005

The Honorable Vincent C. Gray
Office of the Mayor
John A. Wilson Building
1350 Pennsylvania Avenue, NW
Washington, DC 20004

FLORIDA

Ronald A. Brise
Chairman
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

The Honorable Rick Scott
Office of the Governor
The Capitol
400 S. Monroe Street
Tallahassee, FL 32399

MARYLAND

Douglas R.M. Nazarian
Chairman
Maryland Public Service Commission
6 St. Paul Street
16th Floor
Baltimore, MD 21202-6806

The Honorable Martin O'Malley
Office of the Governor
State House
100 State Circle
Annapolis, MD 21401-1925

MASSACHUSETTS

Geoffrey G. Why
Commissioner
Department of Telecommunications
and Cable
1000 Washington Street
Suite 820
Boston, MA 02118

The Honorable Deval Patrick
Office of the Governor
Room 360
Boston, MA 02133

NEW JERSEY

Robert M. Hanna
President
New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

The Honorable Chris Christie
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

NEW YORK

Garry A. Brown
Chairman
Office of Consumer Service
3 Empire State Plaza
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

NORTH CAROLINA

Edward S. Finley Jr.
Chairman
Utilities Commission – Public Staff
Consumer Services
4326 Mail Service Center
Raleigh, NC 27699-4326

The Honorable Pat McCrory
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

PENNSYLVANIA

Robert F. Powelson
Chairman
Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

The Honorable Tom Corbett
Office of the Governor
225 Main Capitol Building
Harrisburg, PA 17120

RHODE ISLAND

Elia Germani
Chairman
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

The Honorable Lincoln D. Chafee
Office of the Governor
222 State House
Providence, RI 02903-1196

TEXAS

Donna L. Nelson
Chair
Public Utilities Commission
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78711

The Honorable Rick Perry
Office of the Governor
P.O. Box 12428
Austin, TX 78711

VIRGINIA

Mark C. Christie
Chairman
State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, VA 23218

The Honorable Robert F. McDonnell
Office of the Governor
Patrick Henry Building
1111 East Broad Street
3rd Floor
Richmond, VA 23219

Secretary of Defense
Attn: Special Asst. for
Telecommunications
Pentagon
Washington, DC 20301

EXHIBIT A

Verizon
22001 Loudoun County Parkway
Room G2-2-556
Ashburn, VA 20147 USA



September 12, 2013

<Customer Name>

<Business Name>

<Street Address>

<City> <State> 10001

<USA>

RE: Account Number: <Account Number>

Dear Valued Customer,

Verizon's ability to stay at the forefront of technology evolution allows us to help businesses innovate, originate and unlock new revenue streams. In order to help you succeed in an ever-changing environment of new competitors, evolving business models, and increasingly globalized markets, we focus on the technologies that influence the way businesses operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

The following interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic, Program Audio and Telegraph Grade (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.1 – CT, NY, MA, RI.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; FCC No. 14, Section 5.2.3 - CA, FL, PA, TX, VA; and FCC No. 16, Section 7.6 – CA, NC, PA, TX, VA.
- **Telegraph Grade.** Telegraph Grade service provides an unconditional analog channel capable of transmitting binary signals at rates of 0-75 baud or 0-150 baud. FCC No.1, Section 7.2.2 – PA, DE, MD, VA, NJ, DC; and FCC No. 11, Section 7.2.2 – CT, NY, MA, RI.

This initiative will allow us to serve you better – ensuring you can seize the advantages of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon Delaware LLC; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon New Jersey Inc.; Verizon North LLC; Verizon California Inc.; Verizon Florida LLC; Verizon South Inc.; and GTE Southwest Incorporated d/b/a Verizon Southwest. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

On or after December 19, 2013, subject to approval from the FCC (the "Effective Date"), Verizon will stop accepting new orders for Grandfathered Services (including requests for moves, adds, or any other changes to existing services). Existing customers of Grandfathered Services may continue to receive existing Grandfathered Services, subject to the terms set forth below.

- On or after June 30, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis six (6) months' written notice before discontinuing a Grandfathered Service.
- If you are subscribed to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service.
- You may terminate your Grandfathered Services at any time.

Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

- *Private IP (PIP) Service.* PIP service is a network-based virtual private network (VPN) enabling customers to communicate effectively over a secure network. It also provides a foundation for automating business processes between companies, including e-commerce, shared intranets, and extranets.
- *Ethernet Services.* Several Ethernet alternatives are available with local, national and international capability, including the following:
 - Ethernet Virtual Private Line (EVPL) – Converged Packet Architecture (CPA). This EVPL service is a point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label Switching (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint, or partial mesh designs to meet evolving data transport needs.
 - Ethernet Virtual Private Line (EVPL) – Switched Ethernet Service (SES). This EVPL service is a point-to-point Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan area Ethernet service that connects customer locations together using Ethernet interfaces of 10, 100, 1,000 or 10,000 Mbps.
 - Ethernet Private Line (EPL) Service. EPL service uses Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed, low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

<VP Name - AVP or GVP>

<Area Vice President>

Verizon Enterprise Solutions

Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Operating Companies - Name and Address
Verizon California Inc. 2535 W. Hillcrest Drive, CAM21LB Newbury Park, CA 91320
Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801
Verizon Florida LLC 610 Zack Street Tampa, FL 33602
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202
Verizon New England Inc. 125 High Street - Oliver Tower 7th Floor Boston, MA 02110
Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102
Verizon New York Inc. 140 West Street New York, NY 10007
Verizon North LLC 1717 Arch Street Philadelphia, PA 19103
Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103
GTE Southwest Incorporated (d/b/a Verizon Southwest) 600 Hidden Ridge Irving, TX 75038
Verizon South Inc. 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Washington, DC Inc. 1300 I Street, N.W., Suite 400 West Washington, DC 20005

Verizon
22001 Loudoun County Parkway
Room G2-2-556
Ashburn, VA 20147 USA



<Customer Name>
<Business Name>
<Street Address>
<City> <State> 10001
<USA>

September 12, 2013

RE: Account Number: <Account Number>

Dear Valued Customer,

Verizon's ability to stay at the forefront of the technology evolution allows us to help government agencies remain efficient, responsive and secure. To consistently help you succeed in an ever-changing and increasingly globalized environment, we continue to focus on the technologies that are influencing the way organizations operate.

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

The following interstate services will be grandfathered in the applicable Verizon FCC tariffs and then later discontinued: Metallic, Program Audio and Telegraph Grade (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. FCC No. 1, Section 7.2.1 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.1 – CT, NY, MA, RI.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. FCC No. 1, Section 7.2.4 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; FCC No. 14, Section 5.2.3 - CA, FL, PA, TX, VA; and FCC No. 16, Section 7.6 – CA, NC, PA, TX, VA.
- **Telegraph Grade.** Telegraph Grade service provides an unconditional analog channel capable of transmitting binary signals at rates of 0-75 baud or 0-150 baud. FCC No.1, Section 7.2.2 – PA, DE, MD, VA, NJ, DC; and FCC No. 11, Section 7.2.2 – CT, NY, MA, RI.

This initiative will allow us to serve you better – ensuring you can seize the advantages of the latest platforms, applications, and solutions. Our newer service platforms allow us to provide you with innovative products, enhanced service monitoring, rapid trouble resolution, and reporting which in turn power your productivity and responsiveness to your customers.

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On or after December 19, 2013, subject to approval from the FCC (the "Effective Date"), Verizon will stop accepting new orders for Grandfathered Services (including requests for moves, adds, or any other changes to existing services). Existing customers of Grandfathered Services may continue to receive existing Grandfathered Services, subject to the terms set forth below.

- On or after June 30, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis six (6) months' written notice before discontinuing a Grandfathered Service.
- If you are subscribed to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service.
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Verizon encourages you to consider alternative services now. There are several suitable alternatives to the Grandfathered Services offered by Verizon. The alternative services include the following:

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- *Ethernet Services.* Several Ethernet alternatives are available with local, national and international capability, including the following:
 - *Ethernet Virtual Private Line (EVPL) – Converged Packet Architecture (CPA).* This EVPL service is a point-to-point Ethernet service. Converged Packet Architecture (CPA) is a Multi-Protocol Label Switching (MPLS)-based network that allows configuration of point-to-point, point-to-multipoint, or partial mesh designs to meet evolving data transport needs.
 - *Ethernet Virtual Private Line (EVPL) – Switched Ethernet Service (SES).* This EVPL service is a point-to-point Ethernet service. Switched Ethernet Service (SES) is a fiber-based, metropolitan area Ethernet service that connects customer locations together using Ethernet interfaces of 10, 100, 1,000 or 10,000 Mbps.
 - *Ethernet Private Line (EPL) Service.* EPL service uses Ethernet over SONET to provide dedicated point-to-point Ethernet connectivity between two locations. EPL circuits provide solutions for customers who require high-speed, low latency and secure Ethernet wide area network (WAN) connectivity.

It is important that you choose an alternative service that is best suited for your needs, both in the short and long term. A Verizon representative will be contacting you to discuss these and other alternatives to determine which solution can provide the most improved capabilities for you.

We value your business and look forward to helping you realize the benefits that our advanced offerings can unlock for you.

Sincerely,

<VP Name - AVP or GVP>

<Area Vice President>

Verizon Enterprise Solutions

Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

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Verizon Operating Companies - Name and Address
Verizon California Inc. 2535 W. Hillcrest Drive, CAM21LB Newbury Park, CA 91320
Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801
Verizon Florida LLC 610 Zack Street Tampa, FL 33602
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202
Verizon New England Inc. 125 High Street - Oliver Tower 7th Floor Boston, MA 02110
Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102
Verizon New York Inc. 140 West Street New York, NY 10007
Verizon North LLC 1717 Arch Street Philadelphia, PA 19103
Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103
GTE Southwest Incorporated (d/b/a Verizon Southwest) 600 Hidden Ridge Irving, TX 75038
Verizon South Inc. 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Washington, DC Inc. 1300 I Street, N.W., Suite 400 West Washington, DC 20005



Global Wholesale
600 Hidden Ridge
HQEWMNOTICES
P.O. Box 152092
Irving, TX 75038

wmnotices@verizon.com

September 12, 2013

[Customer Name
Customer Address]

RE: Notice of Grandfathering and Discontinuance of Certain Verizon Interstate Metallic,
Program Audio and Telegraph Grade Services

Dear Valued Customer:

As part of our on-going effort to update our portfolio of solutions, the Verizon operating companies listed in Exhibit A (for the purposes of this letter, individually and collectively referred to as "Verizon") plan to grandfather and discontinue certain services.

The following interstate services will be grandfathered in the applicable Verizon interstate (FCC) tariffs and then later discontinued: Metallic, Program Audio and Telegraph Grade (individually and collectively referred to as the "Grandfathered Service(s)").

- **Metallic.** Metallic service provides an unconditioned analog two-wire channel capable of transmitting low speed varying signals at rates up to 30 baud. Tariff FCC No. 1, Section 7.2.1 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.1 – CT, NY, MA, RI.
- **Program Audio.** Program Audio service provides an analog channel measured in Hz for the transmission of a complex signal voltage. Tariff FCC No. 1, Section 7.2.4 – PA, DE, MD, VA, NJ, DC; FCC No. 11, Section 7.2.4 – CT, NY, MA, RI; FCC No. 14, Section 5.2.3 - CA, FL, PA, TX, VA; and FCC No. 16, Section 7.6 – CA, NC, PA, TX, VA.
- **Telegraph Grade.** Telegraph Grade service provides an unconditional analog channel capable of transmitting binary signals at rates of 0-75 baud or 0-150 baud. Tariff FCC No.1, Section 7.2.2 – PA, DE, MD, VA, NJ, DC; and FCC No. 11, Section 7.2.2 – CT, NY, MA, RI.

On or after December 19, 2013, subject to approval from the Federal Communications Commission (the "Effective Date"), Verizon will stop accepting new orders for Grandfathered Services (including requests for moves, adds, or any other changes to existing services). Existing customers of Grandfathered Services may continue to receive existing Grandfathered Services, subject to the terms set forth below.

- On or after June 30, 2014, Verizon plans to discontinue the Grandfathered Services. Verizon will provide customers who purchase Grandfathered Services on a month-to-month or a daily basis six (6) months' written notice before discontinuing a Grandfathered Service.
- If you are subscribed to a Grandfathered Service on the Effective Date, Verizon will continue to provide you with the Grandfathered Service until either you cancel the Grandfathered Service or Verizon terminates the Grandfathered Service.
- You may terminate your Grandfathered Services at any time.

If you wish to make arrangements for alternative service or have questions about this letter, please contact your Verizon account team representative.

Sincerely,

VERIZON GLOBAL WHOLESALE

By Overnight Delivery

FCC Required Notice: The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 30 days after the Commission releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Verizon New England Inc.; Verizon New York Inc.; Verizon Delaware LLC; Verizon Pennsylvania LLC; Verizon Virginia LLC; Verizon Washington, DC Inc.; Verizon Maryland LLC; Verizon New Jersey Inc.; Verizon North LLC; Verizon California Inc.; Verizon Florida LLC; Verizon South Inc.; and GTE Southwest Incorporated d/b/a Verizon Southwest. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Exhibit A

Sections 63.71(a) and (b) of the FCC's rules require Verizon to provide the following information:

Name and Address of Carriers (47 C.F.R. §§ 63.71 (a)(1), (b)(2)):

Verizon Operating Companies - Name and Address
Verizon California Inc. 2535 W. Hillcrest Drive, CAM21LB Newbury Park, CA 91320
Verizon Delaware LLC 901 Tatnall Street Wilmington, DE 19801
Verizon Florida LLC 610 Zack Street Tampa, FL 33602
Verizon Maryland LLC 1 East Pratt Street Baltimore, MD 21202
Verizon New England Inc. 125 High Street - Oliver Tower 7th Floor Boston, MA 02110
Verizon New Jersey Inc. 540 Broad Street Newark, NJ 07102
Verizon New York Inc. 140 West Street New York, NY 10007
Verizon North LLC 1717 Arch Street Philadelphia, PA 19103
Verizon Pennsylvania LLC 1717 Arch Street Philadelphia, PA 19103
GTE Southwest Incorporated (d/b/a Verizon Southwest) 600 Hidden Ridge Irving, TX 75038
Verizon South Inc. 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Virginia LLC 22001 Loudoun County Parkway Ashburn, VA 20147
Verizon Washington, DC Inc. 1300 I Street, N.W., Suite 400 West Washington, DC 20005